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*Attorneys for Lead Plaintiffs Robert Wolfson and Frank
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

ROBERT CRAGO, Individually And On Behalf
Of All Others Similarly Situated,

Plaintiff,

v.

CHARLES SCHWAB & CO., INC., and THE
CHARLES SCHWAB CORPORATION,

Defendants.

Case No. 3:16-cv-3938-RS

CLASS ACTION

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF CLASS
CERTIFICATION SCHEDULE**

1 Pursuant to Local Rule 6-2, Lead Plaintiffs Robert Wolfson and Frank Pino and named
2 plaintiff Scott Posson (“Plaintiffs”), and Defendants Charles Schwab & Co., Inc. and The Charles
3 Schwab Corporation (“Defendants” or “Schwab” and, together with Plaintiffs, the “Parties”), by and
4 through their respective counsel, for good cause, hereby stipulate as follows:

5 WHEREAS, on April 15, 2019, the Court entered a Case Management Scheduling Order
6 setting the case schedule through the class certification hearing (ECF No. 144);

7 WHEREAS, the Parties have engaged in class certification and merits discovery and are
8 continuing to meet and confer in good faith regarding outstanding issues;

9 WHEREAS, on February 5, 2020, Plaintiffs noticed a Rule 30(b)(6) deposition and Schwab
10 has informed Plaintiffs that its witness is not available until May 7, 2020;

11 WHEREAS, the current deadline for pre-class certification fact depositions is April 24,
12 2020;

13 WHEREAS, the Parties need an extension of the current class certification deadlines to
14 accommodate the date of this deposition;

15 WHEREAS, the Parties have agreed, with the Court’s approval, to modify the Case
16 Management Scheduling Order to extend the deadlines through the class certification hearing;

17 WHEREAS, this is the Parties’ fourth request for an extension of the deadlines in the Case
18 Management Scheduling Order;

19 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO
20 APPROVAL BY THIS COURT, as follows:

21 The deadlines through the class certification hearing shall be as follows:
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Event	Deadline
Pre-class certification fact depositions	June 12, 2020
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	July 14, 2020
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	September 29, 2020
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	November 17, 2020
Expert depositions concerning class certification	November 30-December 14, 2020
Plaintiffs' class certification motion and <i>Daubert</i> challenges	January 8, 2021
Defendants' class certification opposition, <i>Daubert</i> challenges, and <i>Daubert</i> opposition	March 10, 2021
Plaintiffs' reply brief, opposition to <i>Daubert</i> challenges, and reply to <i>Daubert</i> challenges of Defendants' expert(s)	March 30, 2021
Defendants' reply to <i>Daubert</i> challenges of Plaintiffs' experts	April 21, 2021
Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court)
Date for Parties to Seek to Engage in Private Mediation	September 4, 2020

IT IS SO STIPULATED.

1 Dated: April 6, 2020

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4 By: /s/ Jonathan Rotter
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1 Dated: April 6, 2020

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14 **ATTESTATION**

15 I, Jonathan Rotter, am the ECF User whose identification and password are being used to
16 file this Proposed Order for Extension of Class Certification Schedule. In compliance with Local
17 Rule 5-1(i)(3), I hereby attest that Counsel for Defendants concur in this filing.
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19 DATED: April 6, 2020

20 /s/ Jonathan Rotter
Jonathan Rotter

[PROPOSED] ORDER

Based on the Parties' stipulation and the good cause described therein, the Court GRANTS this stipulation. The following schedule shall apply:

Event	Deadline
Pre-class certification fact depositions	June 12, 2020
Plaintiffs' expert disclosures and report(s) concerning class certification (including any backup materials)	July 14, 2020
Defendants' expert disclosures and report(s) concerning class certification (including any backup materials)	September 29, 2020
Plaintiffs' rebuttal report(s) concerning class certification (including any backup materials)	November 17, 2020
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Class Certification Hearing	TBD (as soon as practicable on a date convenient to the Court)
Date for Parties to Seek to Engage in Private Mediation	September 4, 2020

IT IS SO ORDERED.

DATED: _____

Hon. Richard Seeborg
U.S. District Court Judge

PROOF OF SERVICE BY ELECTRONIC POSTING

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On April 6, 2020, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Northern District of California, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on April 6, 2020, at Los Angeles, California.

s/ Jonathan M. Rotter

Jonathan M. Rotter